

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

AMEER J. KIANI,  
Defendant.

File No. 15-20097  
Hon. Thomas L. Ludington  
Mag. Patricia T. Morris

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UNITED STATES ATTORNEY'S OFFICE  
BY: ANTHONY VANCE, P61148  
Assistant United States Attorney  
101 First Street, Suite 200  
Bay City, Michigan 48708  
(989) 895-5712

ROBERT J. DUNN (P33726)  
Attorney for Defendant  
1020 N. Johnson Street  
Bay City, Michigan 48708  
989-894-1110

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**AMENDED**  
**DEFENDANT'S MOTION AND BRIEF IN**  
**SUPPORT SEEKING A HEARING REGARDING**  
**RELEASE FROM HOSPITALIZATION BASED ON NEWLY**  
**DISCOVERED AVAILABILITY OF A MICHIGAN TREATMENT FACILITY**

NOW COMES the Defendant, AMEER J. KIANI, by and through his Attorney, ROBERT J. DUNN, and for his motion respectfully states as follows:

1. That this Court found in its July 26, 2017 Order that the Federal Medical Center and Risk Assessment Panel Report for 2017 that Mr. Kiani had recovered sufficiently to be released pursuant to a conditional release plan but did not submit such a plan. The Court ordered that a release plan be put together by the government.

2. That an Independent Examiner, Dr. Shapse, also found that Mr. Kiani is safe to be released and that report was submitted to the Court.
3. That in April, 2018, Mr. Kiani remains confined to a hospital in a Massachusetts hospital with little or no treatment offered because none is really needed.
4. That a facility in Cheboygan County, Michigan, close to his family's home, called Whispering Pines is a state certified treatment facility and Mr. Kiani's medical and SSI benefits would be available. (See attached).

WHEREFORE, Defendant respectfully prays for a hearing on this matter and an order directing the government to investigate this placement.

DATED: May 15, 2018

Respectfully submitted,  
s/Robert J. Dunn  
ROBERT J. DUNN (P33726)  
Attorney for Defendant  
1020 N. Johnson Street  
Bay City, Michigan 48708  
(989) 989-894-1110  
[rjdunn928@yahoo.com](mailto:rjdunn928@yahoo.com)

**CERTIFICATE OF SERVICE AND FILING**

I hereby certify that this Defendant's AMENDED Motion And Brief In Support Seeking A Hearing Regarding Release From Hospitalization Based On Newly Discovered Availability Of A Michigan Treatment Facility was electronically filed on this date, and electronically served to all parties of the case and also mailed by U.S. First Class Mail to the Defendant.

Dated: May 15, 2018

s/Cynthia L. Eigner  
Legal Assistant to Robert J. Dunn  
1020 N. Johnson Street  
Bay City, Michigan 48708  
(989) 894-1110  
[rjdunn928@yahoo.com](mailto:rjdunn928@yahoo.com)

To whom it may concern,

Whispering Pines 2, AFC, LLC would be willing to reconsider Ameer Kiani as a resident if he were moved to Michigan, but only under the conditions that he is set up through CMH, has a guardian, social security, contract payment, and we had a bed available. Whispering Pines 2 can not hold a bed for Ameer Kiani at this point.

If you have any questions or concerns you can contact Steven and/or Dorthy Wilson at

Home# 231-238-9715

Cell# 231-420-9590

Thank you and have a great day.